



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

Linda Conlan, PG  
Geomatrix Consultants, Inc.  
510 Superior Avenue, Suite 200  
Newport Beach, CA 92663

Re: Request for Approval of PCB Cleanup Notification Plan

Dear Ms. Conlan:

EPA has reviewed your application dated September 27, 2006 for self-implementing on-site cleanup and disposal of PCB remediation waste in accordance with the Toxic Substances Control Act (TSCA) regulations found at 40 CFR § 761.61(a). The application consists of the September 27, 2006 "Polychlorinated Biphenyls (PCB) Notification Plan, Pechiney Cast Plate, Inc. Facility, Vernon, California" prepared for Alcan, Inc. by Geomatrix Consultants, Inc. EPA is unable to approve your application.

The EPA review found that the application did not satisfy several of the requirements imposed under 40 CFR § 761.61(a). Should you wish to resubmit the application for EPA review, the following changes are recommended:

- 1) Application Structure: The application should be revised to meet the five-part structure of 40 CFR § 761.61(a)(3)(i)(A)-(E).
- 2) Nature of Contamination: The application assumes releases of PCBs occurred prior to 1979. However, the application appears to indicate that the use of PCBs in galbestos and paint continues, and equipment that could have released PCBs may have been present after 1979. Additional evidence is required that PCB releases occurred before 1979. Otherwise, the releases should be assumed to have occurred during or after 1979 and the appropriate cleanup standards under 40 CFR § 761.61(a)(4) should be applied.

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SURNAME	Wentworth	Burns				
DATE	10/5/06	10/5/06				

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